

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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RHINESTONE JEWELRY CORPORATION,

Plaintiff,

-against-

BLING JEWELRY INC., EJEWELER.COM LLC d/b/a  
OVERSTOCKJEWELER.COM, ELENA CASTAÑEDA,  
and JOHN DOES 1-10,

Defendants.  
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No. 17cv8202(GBD)

**JOINT PROPOSED CIVIL CASE MANAGEMENT PLAN**

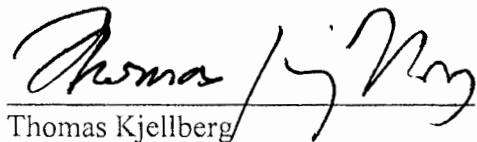
In accordance with the Court's October 26, 2017 Order, and in advance of the February 13, 2018 Initial Pretrial Conference, the parties jointly propose the following Case Management Plan and scheduling order.

1. No additional parties may be joined after May 1, 2018.
2. No amendment to the pleadings will be permitted after May 1, 2018.
3. Except for good cause shown, all discovery shall be commenced in time to be completed by July 3, 2018. The Court expects discovery to be completed within 90 days of the first scheduling conference unless, after the expiration of that 90 days period, all counsel stipulate that additional time (not to exceed 60 more days) is needed to complete discovery. In such event, discovery may be extended by the parties on consent, without application to the Court, provided the parties are certain they can still meet the discovery completion date ordered by the Court. The discovery completion date shall not be adjourned except upon a showing of extraordinary circumstances.
4. Dispositive motions are to be served by August 7, 2018. Answering papers are to be served within fourteen (14) days. Reply papers are to be served within seven (7) days. In the event that a dispositive motion is made, the date for submitting the Joint Pretrial Order shall be changed from that shown herein to three (3) weeks from the decision on the motion. The final pretrial conference shall be adjourned to a date four (4) weeks from the decision on the motion.
5. A final pretrial conference will be held on September 4, 2018.
6. The Joint Pretrial Order shall be filed no later than September 4, 2018. The requirements for the pretrial order and other pretrial submissions shall be governed by the Court's Individual Rules of Practice.

7. All motions and applications shall be governed by the Court's Individual Rules of Practice.
8. The parties shall be ready for trial within 48 hours' notice on or after October 2, 2018. The estimated trial time is two (2) days; this is a nonjury trial.
9. The Next Case Management Conference will be held on May 1, 2018.

Dated: February 6, 2018  
New York, New York

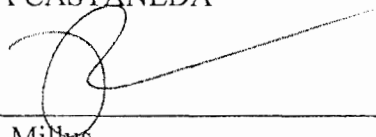
RHINESTONE JEWELRY CORPORATION



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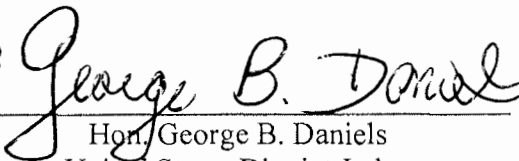


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Attorneys for Defendants Bling Jewelry Inc.,  
Ejeweler.Com LLC, and Elena Castaneda

SO ORDERED:

FEB 08 2018



Hon. George B. Daniels  
United States District Judge

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